

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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TYIESHA WOOTEN,	)	
	)	
Plaintiff,	)	Case No. 2:18-cv-02242
	)	
v.	)	Judge Norris
	)	
PARK HOTELS AND RESORTS, INC.,	)	Magistrate Judge Claxton
d/b/a HAMPTON INN AND SUITES	)	
	)	
Defendant.	)	

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**JOINT MOTION TO AMEND SCHEDULING ORDER**

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Plaintiff Tyiesha Wooten (“Plaintiff”) and Defendant Park Hotels and Resorts, Inc. (“Park”) (together “the Parties”) respectfully request that the Court amend the Scheduling Order (Doc. 26) in order to reset the remaining deadlines, including the trial date, for good cause shown. In support of this motion, the Parties respectfully submit as follows:

1. On July 12, 2018, the Court issued the Scheduling Order (Doc. 26).
2. The Parties have engaged in significant discovery and have scheduled depositions in January and February 2019.
3. The Parties engaged in early mediation of this case, but would like the opportunity to explore further alternative dispute resolution after completion of the depositions. (*See* Doc. 33).
4. On May 18, 2018, Park filed a Motion to Dismiss and Compel Arbitration, which remains pending. (Doc. 15).

5. On August 10, 2018, Plaintiff filed a Motion for Leave to File an Amended Complaint, which remains pending. (Doc. 29).

6. On September 10, 2018, Park filed a Rule 12(b)(6) Motion to Dismiss Plaintiff's Complaint, which remains pending. (Doc. 34).

7. Additionally, Park's lead trial counsel, Rachel Rosenblatt, is expecting a child on April 8, 2019 and anticipates taking maternity leave from April 8, 2019 until August 1, 2019.

8. As a result of the Parties' potential need for further alternative dispute resolution, the Parties' various pending motions, and Park's lead trial counsel's expected unavailability for the trial, the Parties respectfully request a brief 90 day extension of the remaining deadlines and request that the Court issue an Order with the following deadlines identified in the Court's Scheduling Order (Doc. 26) to be re-set as follows:

Supplementation Under Rule 26(e)(2):	from February 8, 2019 to <b>May 8, 2019</b>
Completing All Discovery:	from February 8, 2019 to <b>May 8, 2019</b>
Filing Dispositive Motions:	from March 8, 2019 to <b>June 10, 2019</b>
Jury Trial:	from July 29, 2019 to <b>October or November 2019</b>

WHEREFORE, Plaintiffs and Defendants respectfully request that the Court amend the Scheduling Order (Doc. 26) to set new deadlines and in any additional manner as this Court deems necessary and appropriate to facilitate the requested relief.

Respectfully submitted,

s/ M. Levy Leatherman

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/s/ Brian Winfrey (with permission by MLL)

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*Attorney for Plaintiff Tyiesha  
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### **CERTIFICATE OF SERVICE**

I hereby certify that, on January 23, 2019, a copy of the foregoing was filed via the Court's electronic filing system and served upon the following:

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/s/ M. Levy Leatherman

M. Levy Leatherman